III.   Remarks

Reconsideration of this application is respectfully requested in light of the above amendments and the following remarks. After the amendments detailed above, claims 1, 3, 6 and 8 have been amended and claims 2, 4-5, 7 and 9-10 have been maintained in their previous form.

Independent claims 1 and 6 have been amended to clarify the subject matter of these claims. In particular, claims 1 and 6 have been amended to clearly indicate that a value for the requested measure is calculated at the allocated dimension level using data obtained from the at least one allocation dimension level supported by the first star and data obtained from the one or more requested dimension levels supported by the second star.

The Examiner rejected claims 1-10 under 35 USC 102(e) as being anticipated by U.S. Pub. No. 2002/0078018 to Tse. Applicants respectfully traverse these rejections since Tse neither teaches nor suggests the limitations of independent claims 1 and 6. Before delving into particular patentability arguments, Applicants wish to lay the groundwork for such arguments by pointing out the general differences between the subject matter of Tse and the subject matter of the pending claims. In a general sense, the Tse reference is directed to methods for populating (i.e. building) multiple data marts using a single aggregation process. To this end, the Tse reference describes defining dimension levels for several stars in several data marts so that the data marts can be built at once in an efficient manner. The apparent novelty lies in the aggregation of data from the detail level up to the desired level of aggregation needed by each star in each data mart, and distributing and storing the data in those marts. *See, for example, page 5, paragraph 71.* Claims 1 and 6 of the present application, however, are not directed to building data marts, but rather are directed to the use of existing data marts to calculate a measure. This understanding is reflected in the first limitation of claim 1, which reads "receiving a request to calculate a measure . . . ." To summarize, the Tse reference concentrates on building data marts, whereas the present claims are generally directed to using existing data marts.

Having described the general differences, attention is now directed to the portions of the Tse reference cited by the Examiner in rejecting independent claims 1 and 6. The Examiner is respectfully reminded that the PTO provides in MPEP 2131 that:

- 5 -

[t]o anticipate a claim, the reference *must teach each and every element of the claim.* . . . (emphasis added).

However, the Tse reference does not teach or suggest at least "determining at least one allocated dimension level for the measure, the allocated dimension level being undefined at a lowest dimension level" and "calculating a value for the measure at the allocated dimension level . . . ." The Examiner cites to paragraphs 56-60 of Tse as disclosing determining at least one allocated level. *See page 3 of the Office Action.* However, paragraphs 56-60 describe manners in which aggregation is incorporated into specific implementations of the Tse invention. For example, in paragraph 57, Tse describes the use of a fact table definition from another data mart for building a current data mart instead of specifying a new fact table definition for the current data mart. Paragraphs 58-60 go on to describe the use of fact aggregates to populate data marts and how such aggregate records are written to particular data marts. As can be appreciated, these paragraphs fail to teach or suggest methodology for calculating a measure by "determining at least one allocated dimension level for the measure, the allocated dimension level being undefined at a lowest dimension level" and "calculating a value for the measure at the allocated dimension level."

Accordingly, claims 1 and 6 are now in condition for allowance. As dependent claims 2-5 and 7-10 depend from and further limit claims 1 and 6, respectively, these claims are now in condition for allowance as well. An early formal notice of allowance of claims is requested.

No fees are believed due. However, if any fees are required to complete this filing, the Commissioner is authorized to charge those fees, or credit any overpayment, to Account No. 13-0480, Attorney Docket No. 68146988.713.

- 6 -

DALDMS/543514.1

PAGE 7/10 * RCVD AT 9/2/2005 3:59:00 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-6/28 * DNIS:2738300 * CSID:214 965 5900 * DURATION (mm-ss):03-04

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If the Examiner has any questions regarding this Amendment and Response to Office Action or the Application in general, Examiner is invited to contact the Applicants' attorney at the below-listed telephone number.

Respectfully submitted,

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- 7 -

DALDMS/543514.1

PAGE 8/10 * RCVD AT 9/2/2005 3:59:00 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-6/28 * DNIS:2738300 * CSID:214 965 5900 * DURATION (mm-ss):03-04